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**FMPC UNDERGROUND STORAGE TANKS -
REQUEST FOR EXTENSION**

05/23/91

DOE-FSO/STATE FIRE MARSHALL

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LETTER



Department of Energy

Fernald Site Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6319

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MAY 23 1991

DOE-1406-91

Mr. Tom Forbes
Corrective Actions Supervisor
Bureau of Underground Storage Tank Regulations
Division of State Fire Marshal
6450 Poe Avenue, Suite 104
Dayton, Ohio 45414-2646

Dear Mr. Forbes:

FMPC UNDERGROUND STORAGE TANKS - REQUEST FOR EXTENSION

Reference: Letter, T. Forbes (Ohio Department of Commerce, Bureau of Underground Storage Tank Regulations) to K. Brakken, "Incident Nos. 319817-01 through 04," dated April 1, 1991

The referenced letter requested the performance and submittal of a Site Assessment (site characterization) in accordance with Ohio Underground Storage Tank (UST) regulations. The purpose of this letter is to provide our proposed plan of action and request an extension of the report submittal deadline required as a result of our intended plans.

Our proposed plan calls for the execution of the following activities to satisfy the intent of the Ohio UST regulations, while integrating the requirements of the ongoing Feed Materials Product Center (FMPC) sitewide Remedial Investigation/Feasibility Study (RI/FS):

1. Characterization of accumulated water - Samples will be taken from the water which has accumulated within the excavations and from the sediments below. These samples will be analyzed for the full spectrum Toxicity Characteristic (as defined by 40 CFR 261.24) plus any potential hazardous contaminants which may have migrated from nearby sources as determined on a location specific basis. This will allow us to pump the excavations and properly dispose of the water.
2. Disposition of water - On the basis of the completed characterization, the water will be removed from the excavations and stored or disposed of in accordance with all applicable regulations. Preliminary results indicate the water can be handled through the existing site water treatment system.
3. Excavation - A photo-ionization detector (PID) will be used to guide further excavation in an attempt to remove contaminated

FERNALD'S MAIN PRIORITY IS CLEANUP

soils resulting from the petroleum releases. Excavation will proceed until soil vapor levels reach background as determined by the PID.

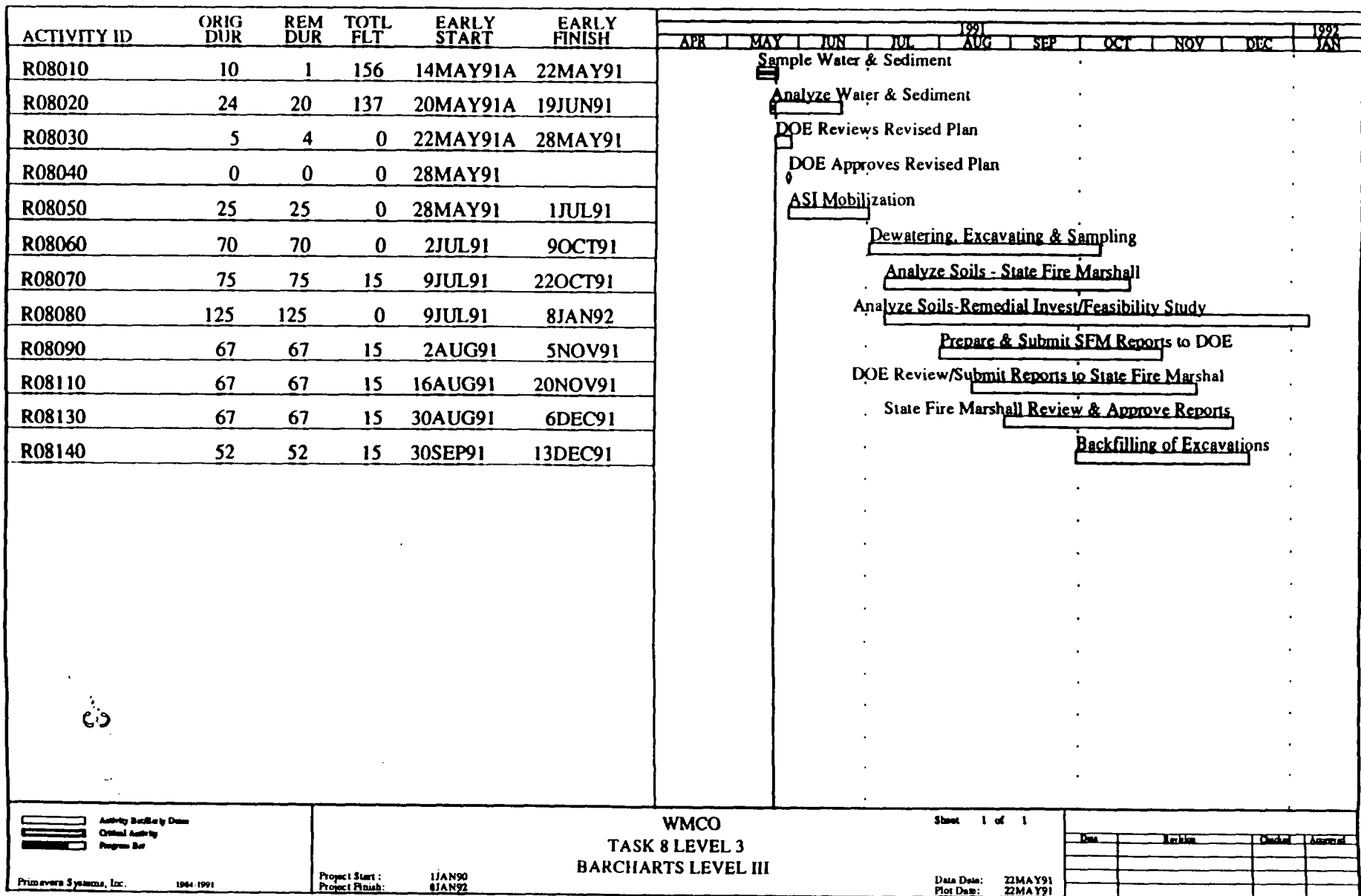
4. Certification sampling - After background vapor levels are achieved, certification samples will be collected from the base of the excavation in accordance with RI/FS protocols. The samples will then be split and analyzed as follows:
 - a. Standard UST Analyses
Total Petroleum Hydrocarbons (TPH)
Benzene, Toluene, Ethyl Benzene, Xylene (BTEX)
Total Lead

(These analyses will be performed on an expedited basis with results expected in 14 days.)
 - b. Standard RI/FS Analyses
Full Radiological Parameters
Full Hazardous Substance List

(These analyses will be performed utilizing the RI/FS laboratory with results expected in 90 days.)
5. Evaluate Data - If the results of the standard UST analyses indicate contaminant levels above the verbal limits formerly conveyed, further dewatering, excavation, and certification sampling will be performed. If the results of the standard UST analyses are below the limits, a report will be prepared and transmitted to your office requesting approval of a clean closure.
6. Fire Marshal Response - If the request for clean closure is granted, the excavations will be backfilled and a final report will be generated for the Administrative Record incorporating all of the RI/FS analytical data into the RI/FS data base for FMPC Operable Unit 5.

The selection of this approach is based upon the known physical characteristics of the clay-rich glacial overburden underlying the production area at the FMPC. It is believed that the proposed excavation program will allow the removal of all of the petroleum contaminants and that the analytical data will provide the necessary justification for a clean closure under Ohio underground storage tank regulations.

A schedule for this proposed course of action is enclosed. We are requesting an extension of the schedule from May 30, 1991 to November 20, 1991.



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C: J Eckstein
J Hall

WMCO
OU 3

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May 28 12 39 PM '91

If there are any questions, our point of contact is K. T. Brakken at (513)
738-6660.

Sincerely,

Ray Hansen

G. W. Westerbeck *for*
Manager

FSO:Brakken

Enclosure: As stated

cc w/encl.:

K. A. Hayes, EM-424, GTN
P. J. Gross, SE-31, ORO
E. Phillips, SE-31, ORO
S. W. Coyle, WMCO
E. D. Savage, WMCO
R. S. Shirley, WMCO
AR File

Allen

Make sure this
gets into AR File

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